

**UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF MASSACHUSETTS**

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JOHN HANCOCK LIFE INSURANCE	)	
COMPANY, JOHN HANCOCK	)	
VARIABLE LIFE INSURANCE	)	
COMPANY, and INVESTORS	)	
PARTNER LIFE INSURANCE	)	
COMPANY,	)	
	)	
Plaintiffs,	)	CIVIL ACTION NO. 03-12501-DPW
	)	
v.	)	
	)	
ABBOTT LABORATORIES,	)	
	)	
Defendant.	)	
	)	

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**PLAINTIFFS' MOTION FOR  
IMPOUNDMENT OF CONFIDENTIAL INFORMATION**

Pursuant to Local Rule 7.2, Plaintiffs John Hancock Life Insurance Company, John Hancock Variable Life Insurance Company, and Investors Partner Life Insurance Company (collectively, “John Hancock” or the “Plaintiffs”) hereby move this Court for leave to file the following documents under Seal:

1. Plaintiffs’ Memorandum of Law in Opposition to Defendant’s Motion for Summary Judgment; and
2. Plaintiffs’ Counterstatement of Facts in Response to Defendant Abbott Laboratories’ Motion for Summary Judgment.

The material to be impounded contains confidential information of Abbott Laboratories (“Abbott”) and/or John Hancock and has been designated “Confidential” or “Highly Confidential” pursuant to the Stipulated Protective Order executed by the parties and entered by the Court in this matter on May 12, 2004 (“Stipulated Protective Order”).

John Hancock has consulted with Abbott pursuant to Local Rule 7.1(A)(2), and Abbott concurs that the above documents should be filed in compliance with the provisions of the Stipulated Protective Order and Local Rule 7.2.

John Hancock respectfully requests that the Confidential Information that is the subject of this Motion be impounded until further Order of the Court.

Respectfully Submitted,

JOHN HANCOCK LIFE INSURANCE  
COMPANY, JOHN HANCOCK VARIABLE LIFE  
INSURANCE COMPANY, AND INVESTORS  
PARTNER LIFE INSURANCE COMPANY,

By Their Attorneys,

/s/ Karen Collari Troake  
Brian A. Davis (BBO No. 546462)  
Michael Arthur Walsh (BBO No. 514875)  
Karen Collari Troake (BBO No. 566922)  
Stacy Blasberg (BBO No. 657420)  
CHOATE, HALL & STEWART  
Exchange Place  
53 State Street  
Boston, Massachusetts 02109-2891  
(617) 248-5000

Dated: October 13, 2004

**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(A)(2)**

The undersigned hereby certifies that counsel for John Hancock Life Insurance Company, John Hancock Variable Life Insurance Company, and Investors Partner Life Insurance Company has conferred with Abbott Laboratories' counsel and that Abbott Laboratories has no objection to impoundment of the documents referenced in the attached Motion.

/s/ Karen Collari Troake  
Karen Collari Troake

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